

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

LEN GAMBOA, *et al.*, individually
and on behalf of all others similarly
situated,

Plaintiffs,

v.

FORD MOTOR COMPANY, *et al.*

Defendants.

Case No. 18-cv-10106-DPH-EAS

Judge Denise P. Hood

Magistrate Judge Kimberly G. Altman

**STIPULATION AND PROPOSED ORDER REQUESTING AN
EXTENSION OF TIME OF THE DEADLINE TO SUBMIT THE PARTIES'
JOINT LIST OF UNRESOLVED ISSUES [ECF Nos. 278, 289]**

This matter comes before the Court upon the following Stipulation of the undersigned parties, who state:

On January 6, 2022, Defendants filed a motion to compel (ECF No. 275), which was referred to Magistrate Judge Stafford on January 13, 2022 (ECF No. 276).¹ Plaintiffs filed their response on January 20, 2022. (ECF No. 277).

On January 24, 2022, the Court issued an Order that, among other things, required the parties to meet and confer, required Plaintiffs to provide a privilege log,

¹ On March 7, 2022, Magistrate Judge Stafford entered an Order of Recusal and Reassignment. The Clerk reassigned the case by blind draw to Magistrate Judge Altman. (ECF No. 284).

and required the parties to submit a joint list of unresolved issues by February 25, 2022. (ECF No. 278).

Since the Court's January 24, 2022 Order, the Plaintiffs have supplemented their production and privilege log, and the parties have engaged in multiple meet and confers and have made substantial progress in narrowing the issues. In light of this progress, and pursuant to the parties' stipulations, the Court has extended the deadline to submit a joint list of unresolved issues on several occasions. (ECF Nos. 281, 288–89). The current deadline to submit a joint list of unresolved issues is Wednesday, April 20, 2022. (ECF No. 289, PageID.13584.)

Defendants have not yet completed their review of Plaintiffs' supplemental productions. The parties submit that good cause exists to further extend the deadline to file their joint list of unresolved issues.

The parties therefore respectfully request that the Court extend the deadline for the parties to file their joint list of unresolved issues by an additional two weeks as follows:

May 4, 2022	Filing deadline for joint list of unresolved issues (see ECF No. 278)
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IT IS ORDERED.

Dated: April 21, 2022

s/Kimberly G. Altman
Kimberly G. Altman
Magistrate Judge

Stipulated and agreed this 20th day of April, 2022:

By: /s/ Peter A. Shaeffer (with consent)

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